

*October 3 conference
adjourned to November 21, 2008 at 11:15 a.m.*

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September 4, 2008

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Honorable P. Kevin Castel

United States District Court Judge

Southern District of New York

500 Pearl Street, Room 2260 Courtroom 12C

New York, New York 10007

USDS SDNY

DOCUMENT

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Re: Estate of Martín Ramírez, et al., v. Maureen Hammond, No. 08-cv-7103 (PKC);
Joint Request for Adjournment of Initial Pretrial Conference Pending Mediation

Dear Judge Castel:

We represent plaintiffs, The Estate of Martín Ramírez, by its duly appointed co-administrators and personal representatives, Martín Ramírez Salinas and Maria de Jesus Reyes Ramírez Miller. This letter is submitted jointly with Kirkland & Ellis LLP, attorneys for the remaining defendant, Maureen Hammond, which has reviewed and approved this letter.

On September 3, 2008, the Estate and Hammond entered into a litigation standstill agreement, in which they have agreed not to pursue further action in this case or in the action pending in the Central District of California while the parties attempt to resolve this matter through mediation. The parties have agreed to expedite the mediation, and expect to hold the mediation by no later than the first week in October, 2008. The parties have already started the process for selecting a mediator and have agreed to do so on an expedited basis.

By Order dated August 25, 2008, Your Honor set October 3, 2008 for the Initial Pretrial Conference. Pursuant to that Order and applicable rules, prior to October 3, the parties would be required to hold the Rule 26(f) Conference, prepare a Case Management Plan, and submit the joint letter. Your Honor also set a pre-motion hearing on October 3, 2008 regarding two letters Hammond has already filed with the Court. Both parties may submit further pre-motion letters prior to the October 3 Conference.

In light of the parties' agreement to attempt to resolve this matter through mediation and without further litigation, the parties jointly request that the Court adjourn the October 3, 2008 Initial Pretrial Conference and related filings and deadlines. The parties shall report to the Court

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when a mediation date is selected, and shall further report to the Court on the status of this matter upon the completion of the mediation, or in the event of any continuation of the mediation. This is the first request for an adjournment and is not made for purposes of delay, but to allow for good faith efforts at resolution of this matter.

Respectfully,



Eric M. Lieberman

cc: Michael T. Walsh (via email)
Yosef J. Riemer, counsel for defendant Maureen Hammond (via email)
Jonathan A. Olsoff, counsel for Sotheby's, Inc. (via email)